

1 MELANIE A. HILL
2 Nevada Bar No. 8796
3 **MELANIE HILL LAW PLLC**
4 1925 Village Center Circle, Ste. 150
5 Las Vegas, Nevada 89134
6 Tel: (702) 362-8500
Fax: (702) 362-8505
Email: Melanie@MelanieHillLaw.com
Attorneys for Plaintiff Augustine Calleros, Jr.

7

8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 AUGUSTINE CALLEROS, JR.,

CASE NO.: 2:23-cv-01340-GMN-DJA

12 Plaintiff,

13 vs.
14 **STIPULATION TO EXTEND DEADLINE**
15 **TO RESPOND TO DEFENDANT'S**
16 **MOTION FOR SUMMARY JUDGMENT**
17 **[ECF No. 44]**

CITY OF NORTH LAS VEGAS, a municipal
corporation,

(Second Request)

18 Defendant.

19 Plaintiff, Augustine Calleros, Jr. ("Calleros"), by and through his counsel, Melanie Hill Law,
20 and Defendant City of North Las Vegas ("CNLV"), by and through its counsel, Madison Zornes-Vela,
21 hereby stipulate to extend the deadlines for Mr. Calleros to respond to the City of North Las Vegas's
22 Motion for Summary Judgment filed on August 28, 2024 [ECF No. 44] from the current deadline of
23 October 18, 2024 to November 18, 2024. This Stipulation is made at the request of Plaintiff's counsel
24 for the reasons set forth herein. This is the second request to extend the deadline to respond to this
25 dispositive motion.

26 In support of this Stipulation and Order, the parties state as follows:
27
28 1. The current deadline to respond to the City of North Las Vegas's Motion for
Summary Judgment filed on August 28, 2024 [ECF No. 44] is October 18, 2024. The parties have

1 agreed to a second extension of the deadline thirty additional days from the current deadline of October
2 18, 2024 until November 18, 2024.

3 2. Counsel for Plaintiff reached out to counsel for Defendant requesting an additional thirty-
4 day extension of the response deadline due to Plaintiff's council's elderly father's current health issues
5 that she is assisting him with that have resulted in her being out of the office significantly over the last
6 3 1/2 weeks and council for Defendant has agreed to the requested extension.

7 3. This stipulation to extend the dispositive motion deadlines is brought in good faith, with a
8 showing of good cause, and is not sought for any improper purpose or other purpose of delay, but to
9 allow counsel for the Plaintiff the additional time requested to respond to the dispositive motion
10 considering the issues she has described herein with her elderly ailing father.

12 WHEREFORE, the parties respectfully request by this stipulation that the Court extend the
13 deadlines for Mr. Calleros to respond to the City of North Las Vegas's Motion for Summary Judgment
14 filed on August 28, 2024 [ECF No. 44] from the current deadlines of October 18, 2024 to November
15 18, 2024.

17 DATED this 18th day of October, 2024.

18 Respectfully submitted,

19 MELANIE HILL LAW PLLC

20 /s/ Melanie Hill

21 Melanie A. Hill, Esq. (NV Bar No. 8796)
22 1925 Village Center Circle, Suite 150
23 Las Vegas, NV 89134
24 Tel.: (702) 362-8500
25 *Attorney for Plaintiff Augustine Calleros, Jr.*

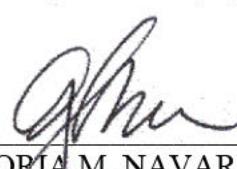
Respectfully submitted,

NORTH LAS VEGAS CITY ATTORNEY

/s/ Madison Zornes-Vela

Madison Zornes-Vela, Esq. (NV Bar No. 13626)
2250 Las Vegas Blvd., N., Suite 810
North Las Vegas, Nevada 89030
Tel: (702) 633-1057
26 *Attorney for Defendant City of North Las Vegas*

27 IT IS SO ORDERED:


28 GLORIA M. NAVARRO
29 UNITED STATES DISTRICT JUDGE

Dated: October 21, 2024